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26<sup>th</sup> July, 1999

EST. 1147/PS/JOS/MA

## BRITISH AIRWAYS ENGINEERING

U.S. Department of Transportation Dockets  
Docket No. FAA-1999-5401,  
400 Seventh ST. SW  
Room Plaza 401  
Washington  
DC 20590

P/No 0181-513-3746  
Fax No. 0181-513-3734

FAA-99-5401-32

**Subject:** **Docket number FAA-1999-5401; Notice NO. 99-02**

Dear Sir / Madam

Regarding the above docket, Congress instructed the administrator to encourage governments of foreign countries and relevant international organisations to develop programs addressing ageing aircraft concerns.

British Airways have reviewed the document in anticipation of its forming the basis of forthcoming JAR legislation, we would like to offer the following comment:-

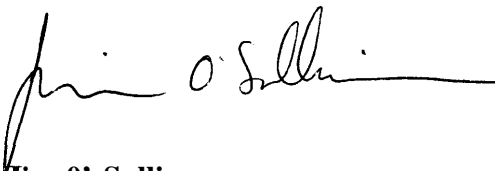
The document makes reference to age sensitive parts and components in several locations and British Airways are concerned about the use of this terminology in legislation without a specific definition of what constitutes an age sensitive part or component.

Existing structural programmes such as the CPCP and SSIP define the critical structure of concern as those principal structural elements (PSE's) as listed in the OEM's SRM.

British Airways believe that the wording in the final rule should reflect the principals already in place with respect to the CPCP and SSIP programmes and read:-

"To demonstrate to the administrator that the maintenance of Principal Structural Elements as listed in the OEM's Structural Repair Manual, has been adequate and timely enough to ensure the highest degree of safety."

Yours faithfully,



**Jim O' Sullivan**  
**Technical & Quality Director**

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DEPT OF TRANSPORTATION  
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